

1 Third-Party Defendant COR Clearing, LLC ("COR") respectfully moves and requests
2 that this Court set a status conference with the Magistrate Judge in the above-referenced matter.
3 COR believes that a status conference is warranted due to recent events in this case. COR has
4 moved to extend the following deadlines by 60 days as they relate to the third-party claims in
5 this action: (a) the discovery cut-off deadline; (b) the expert disclosure deadline; and (c) the
6 dispositive motion deadline. In addition, Michael Sammons filed a notice of appeal earlier this
7 week, *see* Doc. 257, for which the Ninth Circuit Court of Appeals has already set a briefing
8 schedule, *see* Doc. 262. Earlier this week, Michael Sammons also filed a conditional Motion for
9 Leave to File a "Second Amended Third Party Complaint," in which Elena Sammons joined.
10 *See* Doc. 263.

12 COR is informed that Plaintiff China Energy Corporation does not oppose a status
13 conference. COR has not had an opportunity to discuss the matter with the other parties.

14 Respectfully submitted this the 19th day of September, 2014.

15 BRET F. MEICH (SBN 11208)
16 ARMSTRONG TEASDALE, LLP
17 3770 Howard Hughes Parkway, Suite 200
18 Las Vegas, NV 89169
Telephone: (775) 322-7400
Facsimile: (775) 322-9049

19 PETER TEPLY, admitted *pro hac vice*
20 MEREDITH LEES, admitted *pro hac vice*
21 REBECCA BEERS, admitted *pro hac vice*
22 RUMBERGER, KIRK & CALDWELL, P.C.
23 2204 Lakeshore Drive, Suite 125
Birmingham, AL 35209-6739
Telephone (205) 327-5550
Facsimile (205) 326-6786

24 By: /s/ Peter J. Tepley
Peter J. Tepley

25 *Counsel for Third-Party Defendant COR Clearing,*
26 *LLC*

CERTIFICATE OF SERVICE

I, Peter J. Tepley, certify that on September 19, 2014, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the electronic mail notice list.

A copy was also served by First Class U.S. Mail, postage prepaid on the following individuals:

Elena Sammons
15706 Seekers St.
San Antonio, TX 78255

Randy Dock Floyd
4000 Goff Road
Aynor, SC 29551

Jun He
231 Split Rock Road
The Woodlands, TX 77381

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed September 19, 2014, at Birmingham, Alabama.

By: /s/ Peter J. Tepley
Peter J. Tepley